

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

No. 24-mc-353 (LJL)

RUDOLPH W. GIULIANI,

Defendant.

**DECLARATION OF M. ANNIE HOUGHTON-LARSEN IN SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL**

I, M. Annie Houghton-Larsen, an attorney admitted to practice in this court, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am counsel to Plaintiffs Ruby Freeman and Wandrea' Moss ("Plaintiffs") in the above-captioned action.

2. I submit this declaration in support of Plaintiffs' Letter-Motion to compel compliance with the information subpoenas issued to Dr. Maria Ryan, Mr. Theodore "Ted" Goodman, and Mr. Ryan Medrano (together, the "Subpoena Recipients").

3. On August 5, 2024, an information subpoena with restraining notice was sent via certified mail, return receipt requested, to Dr. Maria Ryan at her residential address at 418 Walnut Street, Manchester, NH 03104-2543. (the "Ryan Subpoena"). A true and correct copy of the Ryan Subpoena is attached as Exhibit 1.

4. On August 5, 2024, an information subpoena with restraining notice was sent via certified mail, return receipt requested, to Mr. Theodore "Ted" Goodman at his residential address

at 710 12th Street S Apt 2422, Arlington, VA 22202. (the “Goodman Subpoena”). A true and correct copy of the Goodman Subpoena is attached as Exhibit 2.

5. An affidavit of service for the Ryan Subpoena via certified mail and of the Goodman Subpoena via certified mail is attached as Exhibit 3.

6. On August 5, 2024, an information subpoena with restraining notice was sent via certified mail, return receipt requested, to Mr. Ryan Medrano at his address 1 Irving Place, Office 1, New York, NY 10003-9701. (the “Medrano Subpoena”). The United States Postal Service was unable to confirm whether the Medrano Subpoena was delivered to Mr. Medrano at his New York address. A true and correct copy of the Medrano Subpoena is attached as Exhibit 4.

7. On August 8, 2024, the United States Postal Service confirmed that the Goodman Subpoena was delivered to Mr. Goodman’s Virginia address. A true and correct copy of the United States Postal Service tracking update is attached as Exhibit 5.

8. On August 9, 2024, the United States Postal Service confirmed that the Ryan Subpoena was delivered to Dr. Ryan’s New Hampshire address. A true and correct copy of the United States Postal Service tracking update is attached as Exhibit 6.

9. On August 14, 2024, the Medrano Subpoena was sent via certified mail, return receipt requested, to Mr. Ryan Medrano’s address at 27 Maryland Plaza 2d Floor, St. Louis, MO 63108. An affidavit of service for the Medrano Subpoena via certified mail is attached as Exhibit 7.

10. On August 16, 2024, Dr. Ryan sent Plaintiffs’ counsel handwritten responses to the Ryan Subpoena, via email. A true and correct copy of Dr. Ryan’s responses to the Ryan Subpoena is attached as Exhibit 8.

11. On August 19, 2024, the United States Postal Service confirmed that the Medrano Subpoena was delivered to Mr. Medrano's Missouri address. A true and correct copy of the United States Postal Service tracking update is attached as Exhibit 9.

12. On September 10, 2024, Mr. Goodman came to the lobby of 787 7th Ave, New York, NY 10019, where offices for Plaintiffs' counsel are located, to deliver exemption claim forms. Out of an abundance of caution, Mr. Goodman was personally served with the Goodman Subpoena while on the premises. An affidavit of personal service for the Goodman Subpoena is attached as Exhibit 10.

13. On October 10, 2024, Plaintiffs' counsel sent Mr. Medrano a letter via certified mail to his Missouri address, reminding him of his obligation to respond. A true and correct copy of the letter mailed to Mr. Medrano is attached as Exhibit 11.

14. On November 5, 2024, Plaintiffs' counsel sent Dr. Ryan an email asking her to address deficiencies in her responses to the Ryan Subpoena and also to amend her responses. A true and correct copy of the email correspondence with Dr. Ryan is attached as Exhibit 12.

15. On November 6, 2024, Plaintiffs' counsel sent Mr. Goodman an email reminding him of his obligation to respond. Plaintiffs further informed Mr. Goodman that Plaintiffs would seek an order to compel his responses if he did not reply by Monday, November 11, 2024 at noon. A true and correct copy of the email correspondence with Mr. Goodman is attached as Exhibit 13.

16. On November 7, 2024, following the status conference with this Court, Mr. Goodman confirmed to me that he received Plaintiffs' November 6, 2024 email and intended to respond.

17. On November 11, 2024, Plaintiffs received Defendant Giuliani's Amended Responses to the Information Subpoena served on him. A true and correct copy of the Defendant Giuliani's Amended Responses to the Information Subpoena is attached as Exhibit 14.

18. On November 13, 2024, Plaintiffs received responses to the information subpoenas served on Rudolph W. Giuliani PLLC; Giuliani Group, LLC; Giuliani and Company, LLC; WorldCapital Payroll Corporation; Giuliani Communications, LLC; Giuliani Partners, LLC; and Giuliani Security and Safety, LLC. A true and correct copy of the response from these entities is attached as Exhibit 15.

19. As of November 14, 2024, Plaintiffs have not received supplemented responses to the Ryan Subpoena or the email sent to Dr. Ryan on November 5, 2024.

20. As of November 14, 2024, Plaintiffs have not received a response to the Goodman Subpoena or the email sent to Mr. Goodman. on November 6, 2024

21. As of November 14, 2024, Plaintiffs have not received a response to the Medrano Subpoena or the letter sent to Mr. Medrano's Missouri address on October 10, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 14, 2024.

s/ M. Annie Houghton-Larsen

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